

EXHIBIT B

CERTIFIED
COPY

In The Matter Of:

*Allan Chiocca v. THE TOWN OF ROCKLAND,
DEIRDRE HALL, EDWARD KIMBALL, LARRY
RYAN, MICHAEL MULLEN JR., MICHAEL
O'LOUGHLIN, RICHARD PENNEY AND KARA
NYMAN,*

Marcia Birmingham

July 21, 2021

*A Plus Reporting Service LLC
55 Whiting Street, Suite 1A
Plainville, CT 06062
203.269.9976*

1 placed on administrative leave in about May of 2018?

2 A It was after Mr. Chiocca was placed on
3 administrative leave.

4 Q So, I was wondering: Did Mr. Chiocca ever
5 refer to himself has a puppet master or a puppeteer?

6 A Yes, he did.

7 Q Approximately on how many occasions did he
8 refer to himself has a puppet master or a puppeteer?

9 A I recall at least six occasions when he
10 would refer to himself by those terms.

11 Q Did he use both of those terms or just one
12 of those terms?

13 A I remember puppet master. I do not
14 remember the other term.

15 Q Can you give me an example, or put it into
16 context, one of the instances in which he referred
17 to himself as a puppet master?

18 A Yes, I can. So, when we would be
19 discussing projects or goals that the Town would
20 want to meet, Mr. Chiocca would describe himself as
21 the puppet master when referring to the board of
22 selectmen. He stated that he could manipulate the
23 board toward the goals that he felt were important
24 for the Town.

25 Q Do you remember this being discussed in

1 Q Can you give me any examples?

2 A Well, on one or two occasions he made
3 derogatory comments about his own wife, you know,
4 that she was easily manipulated, pliable, those
5 types of things. I guess a specific occasion I
6 remember was shortly before Mr. Chiocca left the
7 town hall, he had been away on a trip. I came into
8 his office to discuss a grant opportunity that was
9 urgent and he had just returned from golfing and he
10 made a comment to me that young hot women like to
11 follow overweight white men around, because they had
12 had women following them at the golf course. And,
13 as I recall, I think I simply said, Okay let's move
14 on and talk about the grant opportunity. So I have,
15 you know, specific examples of that nature.

16 Q Okay. I'm going to go through each of
17 these a little bit.

18 Do you recall when he made the
19 comments about his wife, that she was easily
20 manipulated?

21 A I'm sorry. I don't understand your
22 question. Are you asking me what I recall or --

23 Q I'm asking if you recall the time frame.

24 A Honestly, it's difficult because the
25 culture at the town hall was such that these things

1 A I think he was somewhat condescending
2 sometimes and I think early on I knew that it would
3 be important for me to make sure that -- I mean,
4 that I was on -- I don't know how to even say this
5 appropriately, but there was a lot of dissension
6 among different people in the town hall. It was
7 very important early on to make sure that I was on
8 Allan's side. He told me early on it would be his
9 way or the highway, which is fine, he was my boss.
10 That was his right to do that. But I do think that
11 sometimes he treated me differently because I was a
12 woman. He's a very traditional man and I think
13 there was some demeaning and some -- maybe demeaning
14 isn't the right word, but condescending attitude and
15 behavior.

16 Q Do you recall -- when did that start?

17 A I mean, it was just a very traditional
18 male-led town hall environment. You know, things
19 like teasing about when you're concerned about a big
20 project and he would say things like, You have to
21 take a bite out the elephant, and used to joke about
22 throwing me off the deep end to see if I could live
23 up to it and he brought me on in the building
24 department first to make sure that they would like
25 me, the guys in the building department, that I


1 STATE OF CONNECTICUT:
2 : ss: Bristol
3 COUNTY OF HARTFORD :
4

5 I, Karen Vibert, LSR No. 00064, a Notary Public
6 for the State of Connecticut, do hereby certify that
7 the deposition of MARCIA BIRMINGHAM, a witness, was
8 taken before me pursuant to Notice, held remotely for
9 all participants, commencing at 10:55 a.m., on
10 July 21, 2021.

11 I further certify that the witness was first sworn
12 by me to tell the truth, the whole truth, and nothing
13 but the truth, and was examined by counsel, and his/her
14 testimony stenographically recorded by me and
15 subsequently transcribed, to the best of my ability, as
16 here before appears.

17 I further certify that I am not related to the
18 parties hereto or their counsel, and that I am not in
19 any way interested in the event of said cause.

20 Dated at Bristol, Connecticut, this 3rd day of
21 August, 2021.

22
23
24 
25 Karen Vibert, Notary Public
My commission expires: 08/31/2024.